

**GIBSON, DUNN & CRUTCHER LLP**

J. Eric Wise  
Shira D. Weiner  
200 Park Avenue  
New York, New York 10166-0193  
Telephone: (212) 351-4000  
Facsimile: (212) 351-4035

Proposed Attorneys for the Debtor  
and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
	:	
<b>IN RE:</b>	:	<b>Chapter 11</b>
	:	
<b>NEWLAND INTERNATIONAL</b>	:	<b>Case No. 13-11396 (MG)</b>
<b>PROPERTIES, CORP.,</b>	:	
	:	
<b>Debtor.</b>	:	
	:	
-----X	:	

**NOTICE OF FILING OF FIRST DAY  
MOTIONS, ENTRY OF ORDERS, OBJECTION  
DEADLINES, HEARING AND FINAL HEARING**

**PLEASE TAKE NOTICE** that on April 30, 2013, the debtor and debtor in possession in the above-captioned case (the “*Debtor*”) filed the following motions:

1. Debtor’s Motion for Entry of an Order (A) Providing Extension of Time to File Schedules and Statements of Financial Affairs; and (B) Waiving Requirement to File Same if Plan Becomes Effective Prior to Expiration of Such Extension (the “*Schedules and Statements Motion*”) [Docket No. 3];
2. Debtor’s Motion for Entry of an Order Confirming the Protections of Sections 362 and 365 of the Bankruptcy Code and Restraining Any Action in Contravention Thereof (the “*Automatic Stay Motion*”) [Docket No. 4];
3. Debtor’s Motion for an Order (A) Waiving the Requirement That the Debtor File a List of Creditors and Equity Security Holders and Authorizing Maintenance of List of Creditors in Lieu of Matrix and (B) Approving Notice, Case Management, and Administrative Procedures (the “*Case Management Procedures Motion*”) [Docket No. 5];
4. Debtor’s Motion for Entry of an Order Authorizing the Debtor to (A) Pay Certain Prepetition Wages, Salaries, and Reimbursable Employee Expenses, (B) Pay and Honor

Employee Medical and Similar Benefits, and (C) Continue Employee Compensation and Employee Benefit Programs (the “**Employee Wage and Benefits Motion**”) [Docket No. 6];

5. Debtor’s Motion for Entry of an Order (I) Authorizing Debtor to Continue Existing Cash Management System, Bank Accounts, and Business Forms and (II) Granting an Extension of Time to Comply With the Requirements of Section 345(b) of the Bankruptcy Code (the “**Cash Management Motion**”) [Docket No. 7];

6. Debtor’s Motion for an Order (A) Authorizing Debtor to Pay Certain Prepetition Claims of Foreign Creditors; and (B) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers (the “**Foreign Creditor Motion**”) [Docket No. 8];

7. Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral and (II) Scheduling a Final Hearing (the “**Cash Collateral Motion**”) [Docket No. 9];

8. Debtor’s Motion for Prepackaged Chapter 11 Case and (I) for an Order (A) Scheduling a Combined Hearing to Consider the Adequacy of the Disclosure Statement and Confirmation of the Plan, (B) Establishing Deadlines for Procedures to File Objections, and (C) Approving the Form and Manner of the Notice of the Combined Hearing, and (II) for an Order (A) Approving the Solicitation Procedures, (B) Approving the Adequacy of the Disclosure Statement, and (C) Confirming the Plan (the “**Scheduling Motion**”) [Docket No. 10];

9. Debtor’s Motion for Entry of an Order Pursuant to Sections 105(a), 327, 328 and 330 of the Bankruptcy Code Authorizing the Debtor to Employ and Retain Certain Professionals Utilized in the Ordinary Course of Business (the “**Ordinary Course Professionals Motion**”) [Docket No. 14];

10. Debtor’s Application for an Order Appointing Epiq Bankruptcy Solutions, LLC as Claims and Noticing Agent for the Debtor Pursuant to 28 U.S.C. § 156(c), 11 U.S.C. § 105(a) and Local Bankruptcy Rule 5075-1 and Granting Related Relief (the “**Epiq 156(c) Retention Application**”) [Docket No. 15];

11. Debtor’s Application for an Order Authorizing and Approving the Employment and Retention of Epiq Bankruptcy Solutions, LLC as Balloting and Tabulation Agent for the Debtor Pursuant to 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a) *Nunc Pro Tunc* to the Petition Date (the “**Epiq Balloting and Tabulation Agent Application**”) [Docket No. 16];

12. Debtor’s Application for an Order Approving the Employment and Retention of Gibson, Dunn & Crutcher LLP as Counsel for the Debtor in Possession *Nunc Pro Tunc* to the Petition Date (the “**GDC Retention Application**”) [Docket No. 20];

13. Debtor’s Application for an Order Approving the Employment and Retention of Adames, Duran, Alfaro & Lopez as Panamanian Counsel for the Debtor in Possession *Nunc Pro Tunc* to the Petition Date (the “**ADURAL Retention Application**”) [Docket No. 21]; and

14. Debtor's Application for an Order Approving the Employment and Retention of Gapstone LLC as Financial Advisor to the Debtor in Possession *Nunc Pro Tunc* to the Petition Date (the "**Gapstone Retention Application**") [Docket No. 22].

**PLEASE TAKE FURTHER NOTICE** that on May 1, 2013, the United States Bankruptcy Court for the Southern District of New York (the "**Court**") entered orders approving the Schedules and Statements Motion [Docket Entry No. 24], the Automatic Stay Motion [Docket Entry No. 25], the Notice and Case Management Procedures Motion [Docket Entry No. 26], the Employee Wage and Benefits Motion [Docket Entry No. 28], the Foreign Creditor Motion [Docket Entry No. 29], the Scheduling Motion [Docket Entry No. 30] and the Epiq 156(c) Retention Application [Docket Entry No. 31].

**PLEASE TAKE FURTHER NOTICE** that on May 1, 2013, the Court entered an interim order approving the Cash Management Motion [Docket Entry No. 27] and the Cash Collateral Motion [Docket Entry No. 32].

**PLEASE TAKE FURTHER NOTICE** that a hearing will be held before the Honorable Martin Glenn, United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on **May 17, 2013 at 10:00 a.m.** prevailing U.S. Eastern time or as soon thereafter as counsel may be heard to consider (i) entry of a final order with respect to approving the Cash Collateral Motion and the Cash Management Motion, and (ii) entry of an order approving the Ordinary Course Professionals Motion, the Epiq Balloting and Tabulation Agent Retention Application, the GDC Retention Application, the ADURAL Retention Application, and the Gapstone Retention Application (the "**Hearing**").

**PLEASE TAKE FURTHER NOTICE** that the Hearing may be adjourned thereafter from time to time without further notice to claimants and other parties other than the announcement of the adjourned date at the Hearing or any other hearing thereafter.

**PLEASE TAKE FURTHER NOTICE** that you need not appear at the Hearing if you do not object to the relief requested in the Cash Management Motion, the Cash Collateral Motion, the Ordinary Course Professionals Motion, the Epiq Balloting and Tabulation Agent Retention Application, the GDC Retention Application, the ADURAL Retention Application, and/or the Gapstone Retention Application.

**PLEASE TAKE FURTHER NOTICE** that any objections to the relief requested in the Cash Management Motion, the Cash Collateral Motion, the Ordinary Course Professionals Motion, the Epiq Balloting and Tabulation Agent Retention Application, the GDC Retention Application, the ADURAL Retention Application, and/or the Gapstone Retention Application must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the clerk of the Bankruptcy Court, One Bowling Green, New York, New York 10004 with a copy delivered directly to the chambers of Honorable Martin Glenn, United States Bankruptcy Judge, together with proof of service thereof, no later than **May 10, 2013, at 4:00 p.m.** prevailing U.S. Eastern time and be served so as to be **ACTUALLY RECEIVED** on or before May 10, 2013 at 4:00 p.m. prevailing U.S. Eastern time by: (i) the Office of the United States Trustee for the

Southern District of New York, 33 Whitehall Street, 21st Floor, New York, NY 10004 (Attn: Serene Nakato, Esq.); (ii) counsel to the Debtor, Gibson Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166 (Attn: J. Eric Wise, Esq. and Shira D. Weiner, Esq.); (iii) counsel to the Indenture Trustee, Chadbourne & Park LLP, 30 Rockefeller Plaza, New York, NY 10112, Attn: Marian Baldwin Fuerst; (iv) counsel to the Steering Group, Seward & Kissel LLP, One Battery Park Plaza, New York, NY 10004, Attn: John R. Ashmead; and (v) the United States Securities and Exchange Commission, New York Regional Office, 3 World Financial Center, Suite 400, New York, NY 10281-1022, Attn: George S. Canellos, Regional Director. Only objections that are timely filed, served, and received will be considered at the Final Hearing. Failure to file a timely objection may result in entry of an order granting the motions as requested by the Debtors.

Dated: May 1, 2013  
New York, New York

Respectfully submitted,

/s/ J. Eric Wise  
J. Eric Wise  
Shira D. Weiner  
**GIBSON, DUNN & CRUTCHER LLP**  
200 Park Avenue  
New York, New York 10166-0193  
Telephone: (212) 351-4000  
Facsimile: (212) 351-4035

**PROPOSED ATTORNEYS FOR THE DEBTOR  
AND DEBTOR IN POSSESSION**